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Attorneys for Plaintiff JPMorgan Chase Bank, National Association,
as successor in interest to Washington Mutual Bank, FA

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

JPMorgan Chase Bank,
Plaintiff,
v.
Satya N. Velu, et al.,
Defendants.

Case No. 3:12-cv-03429-SBA

JUDGMENT IN FAVOR OF PLAINTIFF
JPMORGAN CHASE BANK

Based on the stipulation of Plaintiff JPMorgan Chase Bank, National Association, as
successor in interest to Washington Mutual Bank, FA ("Plaintiff"), and Defendant United States
of America ("United States"),¹ and good cause appearing therefor,

IT IS HEREBY ORDERED, ADJUDGED and DECREED that judgment be and hereby
is entered in favor of Plaintiff and against the United States on Plaintiff's first cause of action for
declaratory relief that the deed of trust in the original principal amount of \$1,445,000 given by
Satya N. Velu and Kamla K. Velu in favor of Plaintiff's predecessor in interest Washington

¹ Suits brought against the Internal Revenue Service and its employees in their official capacities are treated as suits against the United States. *See State of Hawaii v. Gordon*, 373 U.S. 57, 58 (1963); *Gilbert v. DaGrossa*, 756 F.2d 1455, 1458 (9th Cir. 1985).

1 Mutual Bank, FA recorded on November 1, 2007 in the Official Records of Alameda County as
 2 Document No. 2007381837 against that certain real property commonly known as 7190
 3 Rosecliff Court, Pleasanton, California, and legally described as follows:

4 All that certain real property in the City of Pleasanton, County of Alameda, State
 5 of California, described as follows:

6 Being a portion of Lot 107 as said Lot 107 is shown on Tract 7255, filed August
 7 10, 2001, in Book 259 of Maps at Page 64-90 inclusive, in series no. 2001-
 8 294955, Official Records of Alameda County, described as follows:

9 Beginning at the most southerly corner of said Lot 107; thence along the general
 10 westerly line of said Lot 107, north 32°29'51" west, 108.80 feet to a non-tangent
 11 curve to the left, having a radial line which bears south 29°24'37" east, a radius of
 12 50.00 feet, a delta of 63°50'31" thence northeasterly and northerly along said
 curve an arc length of 55.71 feet; thence along the northerly line of said Lot 107,
 north 89°21'12" east, 149.12 feet; thence leaving said northerly line south
 37°45'46" east, 42.88 feet to the southeasterly line of said Lot 107; thence along
 said southeasterly line, south 47°43'34" west, 76.03 feet; thence continuing along
 said southeasterly line, south 57°30'09" west, 102.00 feet to the point of
 beginning

13 (the "Subject Property"), has priority over the Federal Tax Lien for tax year 2004, notice of
 14 which was recorded on December 23, 2009 in the Official Records of Alameda County as
 15 Document No. 2009393503; the Federal Tax Lien for tax year 2005, notice of which was
 16 recorded on September 25, 2007 in the Official Records of Alameda County as Document No.
 17 2007341871; the Federal Tax Lien for tax year 2006, notice of which was recorded on February
 18 25, 2008 in the Official Records of Alameda County as Document No. 2008065304; and the
 19 Federal Tax Lien for tax year 2007, notice of which was recorded on February 6, 2009 in the
 20 Official Records of Alameda County as Document No. 2009043115, which Federal Tax Liens
 21 are junior and subordinate to the WAMU Deed of Trust but nevertheless remain as liens against
 22 the Subject Property. Each party shall bear its own costs and attorney's fees through entry of
 23 judgment.

1 Dated: JUNE 24 , 2013

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3 SAUNDRA BROWN ARMSTRONG
4 UNITED STATES DISTRICT JUDGE
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